

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

KAREN BACKUES KEIL, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 5:18-CV-06074-BP
)	
EDWARD BEARDEN,)	
)	
Defendant.)	

REQUEST FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM

Plaintiffs respectfully petition this Court to issue a Motion for a Writ of Habeas Corpus Ad Testificandum for Plaintiff Lynnsey Betz. In support of this Petition, Plaintiffs state as follows:

1. This Court has the authority and discretion to issue a writ of habeas corpus ad testificandum where an inmate-witness's testimony is relevant and necessary to the pending action. 28 U.S.C. §§ 1651(a) and 2241(c)(5).
2. Plaintiff Lynnsey Betz is currently confined at Grundy County Jail at 115 East 8th Street, Trenton, MO, 64683.
3. The presence of Plaintiff Lynnsey Betz is not only necessary, it is required – to give testimony in her lawsuit set for trial beginning January 31, 2022.
4. Plaintiff Lynnsey Betz's case has been consolidated with three other cases, all of which are actions pursuant to 42 U.S.C. § 1983, where Plaintiffs seek compensatory and punitive damages against Defendant Edward Bearden for violations of their constitutional rights while acting under color of state law, together with reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988.

5. In summary, Plaintiffs' allegations against Defendant are that the Defendant Corrections Officers harassed, abused, and sexually assaulted them during their confinement at the Chillicothe Correctional Center in Missouri between June 2012 and October 2018.

6. Lynnsey Betz's testimony is relevant, necessary and required for trial of these cases.

WHEREFORE, Plaintiffs respectfully requests that the Clerk of the Court be directed to issue a certified Writ of Habeas Corpus Ad Testificandum commanding Sherriff Rodney Herring at the Grundy County Jail to produce Plaintiff Lynnsey Betz in the United States District Courthouse in Kansas City, Missouri, on January 31, 2022, and through February 4, 2022.

Respectfully submitted,

/s/ Jenifer C. Snow

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Writ of Habeas Corpus Ad Testificandum has been served upon Counsel of Record by means of electronic email this 21st day of January 2022.

/s/ Jenifer C. Snow _____